

Exhibit D

Schwartz, Barbara

From: Priselac, Jessica
Sent: Wednesday, November 4, 2020 12:52 PM
To: 'Adam Slater'
Cc: Schwartz, Barbara; Hajavi, Yalda; George T. Williamson; Goldberg, Seth A.; Hill, Coleen W.; Layne Hilton
Subject: RE: ZHP Party Depositions

Adam,

I'm writing to memorialize the productive meet and confer that we had yesterday, and to confirm each side's next steps to move this process across the finish line. Specifically, we discussed a number of terms that repeat throughout the notice that we think are limited by the Court's prior discovery orders, including:

- "API"
- "Finished dose"
- "Testing"

We also discussed limiting the term "nitrosamines" to apply only to NDMA and NDEA.

We understand that you plan to confer further with your side after considering the limitations we have proposed for these definitions, as well certain clarifications we have proposed on a number of topics, and that you will circle back and suggest revised language for our next meet and confer. For our part, we have agreed to provide clarification as to the SOPs and cGMPs that may or may not be at issue.

We look forward to our next meet and confer on these issues.

Best regards,

Jessica Priselac
Attorney at Law

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From: Adam Slater <ASlater@mazieslater.com>
Sent: Tuesday, November 3, 2020 10:14 AM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Layne Hilton <l.hilton@kanner-law.com>
Cc: Schwartz, Barbara <BASchwartz@duanemorris.com>; Hajavi, Yalda <YHajavi@duanemorris.com>; George T. Williamson <gwilliamson@farr.com>
Subject: Re: ZHP Party Depositions

We will be sending you a redline of the last version of the deposition protocol today before our call which will address the issues discussed with the Court, and a handful of other modifications that seemed necessary.

We can discuss the addendum if there is time but the priority is figuring out who the corporate reps are, discussing your objections, and hopefully making progress on figuring out who will be deposed and in what capacities, and completing discussions on the dep protocol.

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Tuesday, November 3, 2020 9:48 AM
To: Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Layne Hilton <l.hilton@kanner-law.com>
Cc: Schwartz, Barbara <BASchwartz@duanemorris.com>; Hajavi, Yalda <YHajavi@duanemorris.com>; George T. Williamson <gwilliamson@farr.com>
Subject: RE: ZHP Party Depositions

Counsel, in addition to the 30(b)(6) notices and depositions, we should also plan to discuss the few outstanding issues with respect to the general deposition protocol, as well as meet and confer regarding the Addendum for the depositions of Chinese nationals.



From: Hill, Coleen W. <CWHill@duanemorris.com>
Sent: Sunday, November 1, 2020 2:07 PM
To: 'Adam Slater' <ASlater@mazieslater.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Layne Hilton <l.hilton@kanner-law.com>
Cc: Schwartz, Barbara <BASchwartz@duanemorris.com>; Hajavi, Yalda <YHajavi@duanemorris.com>; George T. Williamson <gwilliamson@farr.com>
Subject: RE: ZHP Party Depositions

Adam,

We are available on Tuesday from 3-5 p.m. to meet and confer on the 30(b)(6) objections and the ZHP party depositions. I'll send a calendar invite and dial-in information to the recipients of this email.

Thanks,
Coleen

Coleen W. Hill*
Associate

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** Not yet admitted to practice in Pennsylvania. Only admitted to practice in Delaware.*

From: Adam Slater <ASlater@mazieslater.com>
Sent: Friday, October 30, 2020 7:01 PM
To: Priselac, Jessica <JPiselac@duanemorris.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Layne Hilton <l.hilton@kanner-law.com>
Cc: Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Hajavi, Yalda <YHajavi@duanemorris.com>; George T. Williamson <gwilliamson@farr.com>
Subject: Re: ZHP Party Depositions

Hi - I'm adding George as well.

We have a standing call already at 11 am - subject to Layne and George, I can do it at 10 eastern or between 3 and 5 eastern.

Please confirm whether this will also encompass the 30 b 6 deps since there are overlapping issues.

Thanks,

Adam Slater

From: Priselac, Jessica <JPiselac@duanemorris.com>
Sent: Friday, October 30, 2020 9:35 AM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>
Cc: Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Hajavi, Yalda <YHajavi@duanemorris.com>
Subject: RE: ZHP Party Depositions

Adam and Layne,

Are you available Tuesday at 11 am for a call on these issues?

Thanks,

Jessica

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From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Tuesday, October 27, 2020 1:53 PM
To: Adam Slater <ASlater@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>
Cc: Priselac, Jessica <JPiselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Hajavi, Yalda <YHajavi@duanemorris.com>
Subject: RE: ZHP Party Depositions

Adam, this afternoon does not work for me. We'll propose a few other dates/times.



From: Adam Slater <ASlater@mazieslater.com>
Sent: Saturday, October 24, 2020 11:55 AM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Layne Hilton <l.hilton@kanner-law.com>
Cc: Priselac, Jessica <JPiselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Hajavi, Yalda <YHajavi@duanemorris.com>
Subject: Re: ZHP Party Depositions

It will be Layne, George, and me, discussing both issues together since there is clearly overlap.

I am able to discuss late afternoon tuesday after 3 and will check with Layne and George - will any time after 3 eastern work for you?

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Saturday, October 24, 2020 8:12 AM
To: Adam Slater <ASlater@mazieslater.com>; Layne Hilton <l.hilton@kanner-law.com>
Cc: Priselac, Jessica <JPiselac@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Hajavi, Yalda <YHajavi@duanemorris.com>
Subject: ZHP Party Depositions

Adam and Layne,

It was not clear to us who is taking the lead for you in talking about the ZHP party depositions, including the 30(b)(6) notice. Layne let us know when we spoke with her on Tuesday that she would be following up to schedule another call. During our discussion about the deposition protocol the 30(b)(6) notice came up, and I

mentioned to Adam the possibility of discussing depositions on Monday at 1:00 or 3:00. However, our team is not available Monday. If you would like to propose a few times for the upcoming week, please do.

Seth



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